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MEMORANDUM

Subject: Transmittal of RCRA Facility Assessment Evaluation

From: Bruce P. Allen, Chief
Technical Section (6H-CT)

To: William K. Honker, Chief
Permit Section (6H-CP)

Attached please find a copy of the following RCRA Facility Assessment Evaluation:

* Facility Name: Texas Eastman

* EPA ID Number: TXD007330202

Please advise us if more information is required and/or if you need further assistance.

Attachment

TEXAS EASTMAN CO.
TXD007330202
X-Ref SA Vol 1

cc: Sam Becker (6H-C)
Original signed by Sam Becker

bcc: B. Taylor (6H-CE)
G. Reiter (6H-HO)
M. McGee (6H-ES)

SUPERFUND FILE

JUN 12 1992

REORGANIZED

6H-CT:Trezzo:tlc:5-6790:4/14/87:Disk #4:FILE CODE:II.B.1 - 0031

6H-CT Boada

6H-CT ALLEN

RCRA FACILITY ASSESSMENT EVALUATION

PRELIMINARY REVIEW AND VISUAL SITE INSPECTION

Region VI, Technical Compliance Section

FACILITY'S NAME(S): Texas Eastman Company

EPA ID NUMBER: TXD007330202

ADDRESS: Hwy. 149 S

LOCATION: Longview, Texas

DATE OF INSPECTION: 1/13-16/87

SITE DESCRIPTION: Part of Eastman Kodak, manufactures chemical and plastics-generator and TSD.

PREPARED BY: W. VanEvers, T. Davis DATE PREPARED: PR-5/9/86, VSI 1/13-16/87

REVIEWED BY: J. Trezzo DATE REVIEWED: _____

ANTICIPATED DRAFT PERMIT DATE: March 87

ANY ON-GOING STATE/FED 264, 265, or 270 CORRECTIVE ACTION OR CERCLA ACTION:
Undetermined but probably State Action.

DOES FACILITY HAVE A CERCLA FILE? YES X NO ____

Was a CERCLA PA/SI performed at this facility: N/A

DOES FACILITY HAVE UIC WELL? YES ____ NO X

TYPE OF DRINKING WATER SUPPLY WITHIN A 3-MILE RADIUS:
Industrial, domestic, municipal, livestock - use GW

TARGET POPULATION WITHIN A 4-MILE RADIUS: 20,000

RECOMMENDATIONS: ____ S.V. X R.F.I. ____ I.M. ____ No Further Action under RFA

(Indicate only one unless I.M. is marked)

____3004(u) ____ 3007

Possible Enforcement Action: ____ 3008(a) ____3008(h)

Form Rev. 4/1/87

I. Preliminary Review of Prior or Continuing Releases of Solid Waste Management Units (SWMU)

A. Evaluation of Information

1. The main purpose is to determine whether there has been or may have been a release(s) of hazardous waste or hazardous constituents from any SWMUs which will require corrective action measures under Section 3004(u) of the RCRA Hazardous and Solid Waste Amendments (HSWA) of 1984. The SWMUs of concern are:

a) SWMUs not regulated under RCRA; and

b) SWMUs regulated under RCRA regardless of whether they are subject to ground water monitoring requirements.

2. The purpose of this review is to:

a) Identify all SWMU;

b) Identify if there have been prior or continuing releases of hazardous wastes or hazardous constituents from such units to any media (air, surface water, ground water, soil & subsurface gas);

c) Determine if such releases caused environmental contamination that would require corrective action; and

d) Determine what additional information or investigation is needed to clarify whether there has been a release or if a potential for a release exists.

II. Visual Site Inspection

A. Purpose

* Verify PR Information

* Identify additional releases

* Assess Condition of Solid Waste Management Units (SWMU)

* Determine Sampling Locations for a Sampling Visit when applicable

B. NUMBER OF SWMU INVESTIGATED DURING THE PR/VSI: 80

LIST OF SWMU	REGULATED BY RCRA*	STATUS**	SUBJECT TO GWM*** SUBPART F
(1) Tank (Catalyst Treatment Basin)	Y	A	N
(2) Surface Impoundment (WWTS-Segment 1)	Y	A	Y
(3) Landfill (Special Waste			

LIST OF SWMU	REGULATED BY RCRA*	STATUS**	SUBJECT TO GWM*** SUBPART F
(4-15) Tanks (12)-organic liquids	Y	A	N
(16) Container Storage Area (Special Waste)	Y	A	N
(17) Tank PE-2 (Catalyst Treatment Basin)	Y	A	N
(18) Landfill (Sanitary)	N	A	N
(19) Surface Impoundment (Heavy Organic Basin)	Y	A	Y
(20) Surface Impoundment (Fly Ash Pond No. 1)	N	A	N
(21) Surface Impoundment (Bottom Ash Pond)	N	A	N
(22) Surface Impoundment (Fly Ash Pond No. 2)	N	I	N
(23) Container Storage Area (PCB)	N	A	N
(24) (2) Surface Impoundments (Chromate Settling Basin 1 & 2)	N(?)	A	?
(25) Incinerator	Y	A	N
(26) Surface Impoundment (Tally 1A)	N	A	N
(27) Container (Railroad Tank Cars)	N	A	N
(28) (6) Surface Impoundment (WWTS-Segment II)	Y	A	N
(29) (2) Surface Impoundment (WWTS-Segment III)	Y	A	Y
(30) Landfill (HW proposed)	Y (Future)	I (Currently)	Y (Future)
(31) (3) Tanks (Acetaldehyde Pretreatment)	Y	A	N
(32) (3) Tanks (79TK1, Andco Unit and Andco Sump)	Y	I	N
(33-37) (5) Tanks (API Separators)	N	A	N
(38) Tank (Activated Sludge Pilot Plant)	Y	A	N
(39) (32) Container (Dumpster of Various Capacities)	N	A	N
(40) (2) Tank (Spent Catalyst Storage)	Y	I	N
(41) (2) Tank (Recycle Facility Surface Tanks)	Y	A	N
(42) (2) Boilers	Y	A	N
(43) Tank (Accumulation)	Y	A	N
(44) Tank (Storage)	Y	A	N
(45) Container Storage (Drum) Semple Accum.	N	A	N
(46) Container Storage (Drum) Sink Drain Accum.	Y	A	N
(47) Container Storage (Fiberdrum) Fiber Accum.	Y	A	N
(48) Tank (Hydrogenation Bed Catalyst)	N	A	N
(49) Container Storage (Waste Mercury)	Y	A	N

LIST OF SWMU	REGULATED BY RCRA*	STATUS**	SUBJECT TO GWM*** SUBPART F
(50) (2) Tank (Small Catalyst Pit)	Y	A	N
(51) Surface Impoundment (EO Flare)	Y	A	Y(?)
(52) Surface Impoundment (Pretreatment Basin)	Y	A	Y(?)
(53) Surface Impoundment (Evaporative Basin)	N	I	N
(54) Tank (Waste Oil Tank)	N	A	N
(55) Container Storage (20 SF-Drum Accumulation Area)	Y	A	N
(56) Container Storage (160 SF Drum Accumulation Area)	Y	A	N
(57) Tank (Processing)	Y	A	N
(58) (2) Surface Impoundment (Calcium Carbonate)	N	I	N
(59) Container Storage (Lab E-8 Waste)	Y	A	N
(60) Container Storage (Lab AE-2 Waste)	Y	A	N
(61) Container Storage (Lab W-6 Waste)	Y	A	N
(62) Container Storage (Lab Waste Accum. Drum)	Y	A	N
(63) Surface Impoundment (Fire Training)	N	I	N
(64) "Other" Surface Impoundment (Fire Training)	Y	N	Y(?)
(65) Tank (Waste Oil)	Y	A	N
(66) Tank (Waste Oil)	Y	A	N
(67) Tank (Waste Oil Sump)	N	A	N
(68) Tank (Waste Oil Sump)	N	A	N
(69) Tank (Waste Oil Sump)	N	A	N
(70) Container (Lab Waste Can)	Y	A	N
(71) Container (Drum Accum. 200 SF)	Y	I	N
(72) Container (Drum Storage 5400 SF)	Y	A	N
(73) Surface Impoundment (Acid Pit)	N	I	N
(74) (2) Surface Impoundment (Waste Oil Pit 1 & 2)	N	I	N
(75) Surface Impoundment (DI Basin)	N(?)	A	?
(76) (2) Surface Impoundment (Skimming #3, Lagoon #1)	Y	I	Y
(77) Surface Impoundment (Tally 1B)	N	I	N
(78) Landfill (5 Cells)	N	I	N
(79) Landfill (5 Cell-Sanitory)	N	I	N
(80) Container Storage (Lake drum area 19000 SF)	N	A	N

C. NUMBER OF SWMU IDENTIFIED DURING THE VSI (NOT IDENTIFIED IN THE PR): 0

D. NUMBER OF SWMU AT WHICH RELEASES HAVE BEEN IDENTIFIED: 15

LIST OF SWMU	REGULATED BY RCRA*	RELEASE TO	NOTED DOCUMENTATION OF RELEASE
(1) Surface Impoundments (WWTS-Segment I)	Y	GW, Soil	Analysis of GWM data
(2) Surface Impoundments (heavy organics basin)	Y	GW, Soil	" "
(3) Special Waste Landfill	Y	GW, Soil	" "
(4) Surface Impoundment (Tally #1A)	N	GW, Soil SW	Dike seeps, GW samples
(5) Surface Impoundments (WWTS Segment II)	Y	GW, Soil	Analysis of GWM data
(6) Surface Impoundments (WWTS Segment III)	Y	GW, Soil	" "
(7) Waste Oil Pits #1 and #2 (closed heavy organics basins)	N	GW, Soil	" "
(8) Surface Impoundment (DI Basin)	N	GW, Soil	" "
(9) Surface Impoundment (Skimming Basin #3 and Lagoon #1	N	GW, Soil	" "
(10) Sanitary Landfill Closed Cell #5	N	GW, Soil	" "
(11-13) Tanks TK65, TK59, TK39	Y	Soil	Visual
(14) Tank (Separator) at Building 25	N	Soil	Visual
(15) Waste Oil Tank At Building 30	N	Soil	Visual

E. NUMBER OF SWMU (REGULATED) AT WHICH RELEASES TO GROUNDWATER HAVE BEEN IDENTIFIED: 6

LIST OF SWMU	REGULATED BY RCRA*	RELEASE TO	NOTED DOCUMENTATION OF RELEASE
(1) Surface Impoundments (WWTS-Segment I)	Y	GW, Soil	Analysis of GWM data
(2) Surface Impoundments (heavy organics basin)	Y	GW, Soil	" "
(3) Special Waste Landfill	Y	GW, Soil	" "
(4) Surface Impoundments (WWTS Segment II)	Y	GW, Soil	Analysis of GWM data
(5) Surface Impoundments (WWTS Segment III)	Y	GW, Soil	" "
(6) Surface Impoundment (Skimming Basin #3 and Lagoon #1	N	GW, Soil	" "

F. NUMBER OF SWMU AT WHICH A RELEASE IS HIGHLY POSSIBLE: 4

LIST OF SWMU

(1) Containers ("Dumpsters" at building 30 and dumpster 60-3)
(2) Container Storage (Drum accumulation area at building 100)
(3) Container Storage (Drum accumulation area at building 6)
(4) Tank (Underground waste oil/solvent tank at building 86)

* Y - Yes
N - No
? - Unknown

** Active or Inactive (A or I)
*** GWM-Ground Water Monitoring

G. NUMBER OF SWMU WHERE A DETERMINATION OF RELEASE CAN NOT BE MADE DUE TO LACK OF INFORMATION: 6

LIST OF SWMU	RATIONALE
(1) Sanitary lanfill	-Unknown amount of hazardous constituents disposed
(2) Surface Impoundment (Chromate settling basins #1 and #2)	-Unlined, presence of hazardous constituents
(3) Surface Impoundments (Evaporative Basin)	-Unknown construction and closure details
(4) Surface Impoundment (Tally #1B)	-Only indicator parameters show release
(5) Sanitary landfill (five closed cells)	-Unknown hazardous constituents present
(6) Sanitary landfill* (closed cells #1 thru #4)	-Wastes from Acid Pit and Waste Oil Pit 1 & 2 put into cells

*(Part is also listed in D)

H. NUMBER OF SWMU WITH NO INDICATED RELEASES: 57
(Documentation is necessary for a SWMU to be included in this category.)

LIST OF SWMU

(1) Tank (Catalyst Treatment Basin)
(2-10) Tanks (9)-organic Liquids
(11) Container Storage Area (Special Waste)
(12) Tank PE-2 (Catalyst Treatment Basin)
(13) Surface Impoundment (Fly Ash Pond No. 1)
(14) Surface Impoundment (Bottom Ash Pond)
(15) Surface Impoundment (Fly Ash Pond No. 2)
(16) Container Storage Area (PCB)
(17) Incinerator
(18) Container (Railroad Tank Cars)
(19) Landfill (HW proposed)
(20) (3) Tanks (Acetaldehyde Pretreatment)

(21) (3) Tanks (79TK1, Andco Unit and Andco Sump)
(22-25) (4) Tanks (API Separators)
(26) Tank (Activated Sludge Pilot Plant)
(27) (31) Container (Dumpster of Various Capacities)
(28) (2) Tank (Spent Catalyst Storage)
(29) (2) Tank (Recycle Facility Surface Tanks)
(30) (2) Boilers
(31) Tank (Accumulation)
(32) Tank (Storage)
(33) Container Storage (Drum) Sample Accum.
(34) Container Storage (Drum) Sink Drain Accum.
(35) Container Storage (Fiberdrum) Fiber Accum.
(36) Tank (Hydrogenation Bed Catalyst)
(37) Container Storage (Waste Mercury)
(38) (2) Tank (Small Catalyst Pit)
(39) Surface Impoundment (EO Flare)
(40) Surface Impoundment (Pretreatment Basin)
(41) Tank (Processing)
(42) (2) Surface Impoundment (Calcium Carbonate)
(43) Container Storage (Lab E-8 Waste)
(44) Container Storage (Lab AE-2 Waste)
(45) Container Storage (Lab W-6 Waste)
(46) Container Storage (Lab Waste Accum. Drum)
(47) Surface Impoundment (Fire Training)
(48) "Other" Surface Impoundment (Fire Training)
(49) Tank (Waste Oil)
(50) Tank (Waste Oil Sump)
(51) Tank (Waste Oil Sump)
(52) Tank (Waste Oil Sump)
(53) Container (Lab Waste Can)
(54) Container (Drum Accum. 200 SF)
(55) Container (Drum Storage 5400 SF)
(56) Surface Impoundment (Acid Pit)
(57) Container Storage (Lake drum area 19000 SF)

I. NUMBER SWMU TO BE INCLUDED IN THE RFI: 12
(Except RCRA units subject to Subpart F)

LIST OF SWMU	RATIONALE
(1) Surface Impoundment (Tally #1A)	Dike seeps, GW samples
(2) Waste Oil Pits #1 and #2 (closed heavy organics basing)	Analysis of GWM data
(3) Surface Impoundment (DI Basin)	" "
(4) Sanitary Landfill Closed Cell #5	" "
(5) Tank (Waste Oil)	Visual
(6) (2) Surface Impoundments (Skimming Basin #3, Lagoon 1)	" "
(7) Sanitary lanfill	Unknown amount of hazardous constituents disposed
(8) Surface Impoundment (Chromate settling basins #1 and #2)	Unlined, presence of hazardous constituents
(9) Surface Impoundments (Evaporative Basin)	Unknown construction and closure details

(10) Surface Impoundment (Tally #18)	Only indicator parameters show release
(11) Sanitary landfill (five closed cells)	Unknown hazardous constituents present
(12) Sanitary landfill* (closed cells #1 thru #4)	Wastes from Acid Pit and Waste Oil Pit 1 & 2 put into cells

K. ARE FACILITY MAPS/PHOTOS INCLUDED WITH ORIGINAL VSI REPORT? YES X NO ___

II. RECOMMENDATIONS/COMMENTS: (EPA, STATE and/or CONTRACTOR)

EPA RECOMMENDS:

EPA recommends an RFI for those units as identified by the State. However, additional information must be gathered during the RFI to substantiate that no further action is needed for unit No. DD.

EPA COMMENTS:

In the March 19, 1987 letter TWC recommended no further action under RFI for No. H(51), No. DD(73) and No. I(50) for various reasons. The reasoning is not adequate for No. H; it should be noted to TWC that ethylene oxide is still or Appendix IX constituent. For No. DD it is unclear if soil samples taken at the time of closure verifies clean closure (also laboratory quantity of wastes is not a reason for exclusion).

It needs to be verified that all applicable surface impoundments are covered by Groundwater monitoring system. The PR indicates that no monitoring wells are at some of the units (i.e. surface impoundment, page 51 of RFA).

It needs to be verified that all surface impoundments that receive ignitable and/or reactive waste meets §265.229. While some documentation has been submitted (a few Surface Impoundments checklist have been enclosed); it would be beneficial to check that all of the surface impoundments meet the requirement.

For Dumpster 60-105 the VSI recommendation indicates that soil contamination is possible for Ni. (SWMU 27).

Minor spillage was indicated at the railroad tank car loading rack (SWMU 27) (page 124 of VSI).

It should be noted that D 11 to 15 are to be addressed in an enforcement action.

Also in the March 19, 1987 letter, some of the PR I.D nos. appear to be mixed up as well as some other information. This should be noted and clarified if possible.

CONCUR: _____ DATE: _____